

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

**UNOPPOSED MOTION BY PLAINTIFFS TO MODIFY
SPECIAL PROTECTIVE ORDER REGARDING OBJECTING STUDENTS (ECF 657)**

Plaintiffs move to modify Paragraph 2(c)(1) of the Amended Special Protective Order Regarding Objecting Students at Cornell University, Georgetown University, and The University of Pennsylvania, ECF No. 657 (“SPO”).

Paragraph 2(c)(1) of the SPO provides that a total of nine people representing Plaintiffs may have access to the Student Information protected by the SPO. In particular, Paragraph 2(c)(1)

specifies that the nine people may be composed of “[n]o more than eight (8) attorneys and one (1) paralegal.” Plaintiffs request that the Court modify Paragraph 2(c)(1) to allow Plaintiffs to substitute a second paralegal in place of one attorney. Plaintiffs have already provided Defendants’ counsel of record with the name of the second Plaintiffs’ paralegal that will have access to protected information if the Court grants this Motion.

Prior to filing this Motion, Plaintiffs conferred with counsel for Defendants Cornell, Georgetown, and Penn, who have stated that they do not oppose this motion. Additionally, Pursuant to ¶ 7 of the SPO, Plaintiffs provided notice of this motion to counsel for the objecting students, who responded by email that they had no objection to this Motion.

For the reasons stated above, Plaintiffs respectfully request that the Court enter a text or minute order modifying Paragraph 2(c)(2) of the SPO to allow Plaintiffs to substitute a second paralegal in place of one attorney.

Dated: May 2, 2024

Respectfully Submitted,

/s/ Robert D. Gilbert

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